

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

VIVIANNA MARTINEZ

VS.

ROBERT E. HAVERSTOCK and
WERNER ENTERPRISES, INC.

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CIVIL NO. 1:15-CV-00125

**NOTICE OF REMOVAL OF DEFENDANTS ROBERT E. HAVERSTOCK and
WERNER ENTERPRISES, INC.**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF TEXAS:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendants, **WERNER ENTERPRISES, INC. and ROBERT E. HAVERSTOCK**, hereby remove this action to the United States District Court for the Southern District of Texas from the County Court At Law #2 of Cameron County, Texas, stating as follows:

1. Plaintiff, Vivianna Martinez, commenced this action in the County Court At Law #2 of Cameron County, Texas, where it was given Cause No. 2015-Ccl-00595. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant Werner Enterprises, Inc. is a Nebraska Corporation and Defendant Robert E. Haverstock is a resident of New York. Further, Plaintiff claims damages for serious personal injury and is seeking damages of \$1,000,000. Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.

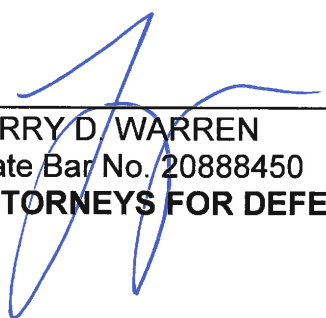
2. Defendants received the summons and complaint on June 18, 2015, so this removal is timely under 28 U.S.C. § 1446(b).

3. A copy of all process, pleadings, and orders served upon Defendants is attached as Exhibit A.

4. Defendants have provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the County Court At Law #2 of Cameron County, Texas.

Dated: July 14th, 2015

Respectfully submitted,



LARRY D. WARREN
State Bar No. 20888450
ATTORNEYS FOR DEFENDANTS

OF COUNSEL:
NAMAN HOWELL SMITH & LEE, PLLC
10001 Reunion Place, Suite 600
San Antonio, Texas 78216
Telephone: (210) 731-6350
Facsimile: (210) 785-2950
lwarren@namanhowell.com

CERTIFICATE OF SERVICE

I hereby certify that on the 10 day of **July 2015**, the foregoing was filed with the Clerk of Court using the CM/ECF system, and was served on counsel:

E-Filing Notification System:

Sandra Eastwood

Jerry J. Trevino

THE LAW OFFICES OF JERRY J. TREVINO

3801 South Padre Island Dr.

Corpus Christi, Texas 78415

Facsimile (361) 882-8355

sandraeastwoodlaw@yahoo.com

ATTORNEYS FOR PLAINTIFF



LARRY D. WARREN